FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO

2017 MAR 22 AM 8:55

CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

JOSEPH ZIEGLER,

Case No: 1:17 CV 599

Plaintiff,

-VS-

Honorable: JUDGE BOYKO

MAG. JUDGE GREENBERG

UNKNOWN EUCLID POLICE OFFICER(S), et al,
DEBORAH LEBARRON,
PATRICK GALLAGER,

Defendants,
_______________________________________/

COMPLAINT FOR CIVIL ACTION

NOW COMES, JOSEPH ZIEGLER, Plaintiff presently filing in Pro Per, Who hereby moves this Honorable U.S. District Court of Northern District of Ohio, pursuant to 42 U.S.C. 1981 et seq through 42 USC 1986 et seq; Federal Common Law; and/or any/all other applicable Federal Statutes on violations of Federal Civil Rights and Federal Law as determined by the U.S. Supreme Court, by filing this herein meritorious Plaintiff's Federal Complaint For Civil Action, based upon any/all of the following:

JURISDICTION

(1) This Pro Se Plaintiff states that he resides within this Honorable United States District Court For Northern District of Ohio's Jurisdiction, and that Defendant(s) et al violated and/or conspired to violate this Plaintiff's clearly established Federal Civil Rights, Federal Law and Federal Constitutional Rights within this Honorable United States District Court For The Northern District of Ohio's Jurisdiction. See 28 USC 1343.

DEMAND FOR JURY TRIAL

(2) This Pro Se Plaintiff states that he has stated a claim upon which relief should be granted against any/all of the Plaintiff's herein Federal Claims For Action, and that a reasonable Juror would rule/decide in Plaintiff's favor that Defendant(s) et al while acting under and outside the color of law blatantly violated Plaintiff's clearly established Federal Civil Rights, Federal Constitutional Rights and demands a Jury Trial. FRCVP Rule 38.

PARTIES PRESENTED

(3) That Plaintiff JOSEPH ZIEGLER is a Free U.S. Citizen that resides at 120 Court St, Chardon, Ohio 44024. Who possesses the capacity to sue the Defendants et at for blatantly violating and/or conspiring to violate the Plaintiff's clearly established Federal Civil Rights, Federal Statutes/Laws, and their U.S. Constitutional Rights protected under Federal Equal Protection of Law as setforth in the herein Claims For Action as determined by the U.S. Supreme Court.

(4) That Defendant(S) UNKNOWN EUCLID POLICE OFFICER(S), at 545 East 222nd Street, Euclid, OH 44123. Who possesses the capacity to be sued for acting under/outside the color of State Law in their official-capacity, and individual-capacity for blatantly violating and/or conspiring to violate clearly established Federal Civil Rights, Federal Laws, and Plaintiff(s) clearly established Federal Constitutional Rights as setforth in the herein Claims For Action as determined by the U.S. Supreme Court.

(5) That Defendant Elected Euclid Judge: DEBORAH A. LEBARRON at the Euclid Municipal Court, 555 East 222nd Street, Euclid, OH 44123. Who possesses the capacity to be sued for acting outside the color of State Law Malciously and Corruptly without Subject Matter Jurisdiction for blatantly violating and/or conspiring to violate clearly established Federal Civil Rights, Federal Laws, and Plaintiff(s) clearly established Federal Constitutional Rights as setforth in the herein Claims For Action as

determined by the U.S. Supreme Court.

(6) That Defendants- Euclid Prosecutor: PATRICK GALLAGER at the Euclid Municipal Court, 555 East 222nd Street, Euclid, OH 44123. Who possesses the capacity to be sued for acting under/outside the color of State Law in his official-capacities, and individual-capacities for blatantly violating and/or conspiring to violate clearly established Federal Civil Rights, Federal Laws, and Plaintiff(s) clearly established Federal Constitutional Rights as setforth in the herein Claims For Action as determined by the U.S. Supreme Court.

FIRST FEDERAL CLAIM FOR ACTION

(7) On FEBRUARY 22,2017, This Plaintiff(ie, Member of National Assocation of Professional Organizers(NAPO) of Black Lives Matter, Stop the Police Brutality, and Judicial Corruption Nationwide was engaging in exercising his clearly established Equal Protection Right to Peacefully Assemble, Association, Protest Police Brutality and Judicial Corruption Nationwide was unlawfully Discriminated against by Unknown Defendant Euclid Police Officer(s) et al while acting under color of law in violation of his Federal Equal Protection Right not to be Discriminated against based upon his Race, Age, National Origin, or for being engaged in a protected Right/Privilege to Peacefully Assemble in the City of Euclid and against the Euclid PD. That resulted in the Defendants violating and/or conspiring to violate this Plaintiff's clearly established Federal Civil Rights to Equal Protection of Law as determined by the U.S. Supreme Court.

(8) On FEBRUARY 22,2017, Numerous Unknown Defendants Euclid Police Officer(s) et al used Unreasonable Excessive Force, Attacked, Assaulted, Threatened, and Unlawfully ordered Medical Staff (ie, Unknown RNs and Doctor at Euclid Hospital) to inject this Plaintiff with a unknown substance/drug to make this Plaintiff unconsious to unlawfully seize/take this Plaintiff's Blood without a Warrant, or

based upon Sworn Affidavit, and without this Plaintiff's consent according the Medical Records and/or Euclid Police Dept Records.

(9) The Defendants Euclid Police Officer(s) et al were present at protest were also fully aware that THE PEOPLE in the State of Ohio and Metro-Cleveland Area are going to quit trying to resolve Federal Civil Rights Violations "civilly" in either State/Federal Courts due to Judicial Corruption, and speak in the universal language that the Tyranical Police, Military and U.S. Government understands. Because, The Police are NOT here to 'Serve and Protect' the Public. All Police Officers and Judges of both State/Federal Just-Us Csytm do is blindly protect eachother under the "Blue Wall of Silence". Our American Forefathers had the exact same problem at Concord when coward brainwashed Redcoats (eg, Military or Police) that think they are above the law fired upon Free American Citizens.

(10) On MARCH 14,2017, The Defendants Euclid Police Dept Murdered a Innocent Black Man in cold blood in the City of Euclid. After this Pro Se Plaintiff fully advised the U.S. Justice Department, Homeland Security, and this Honorable Federal Court. That Citizens and Miltia have decided to resolve this widespread problem of the Federal/State Court Judges condoning Police Officers "lawful actions" of murdering unarmed Africian Americans with a Isreali Government Biblical Solution like when the Palestinians Murder one Innocent Unarmed Isreal Citizen. This Plaintiff does not condone/support violence, but has heard numerous recently returned U.S. Soldiers from combat in the Middle East tell the Public. That even in combat situation according to the Geneva Convention it is cowardly and illegal to murder unarmed citizens for failure to follow orders, running for their lifes, and that police officers are not in a combat situation. Citizens have a legal right to make a citizens arrest in the State of Ohio, and follows the Law by example. Thus, If a Citizen exercising that Right to make a Citizens Arrest for possible Felony(ie, they are innocent until proven guilty beyond a reasonable doubt), and if the

accused Felony/Person is Armed and does not know/care that it is a off-duty police officer, attorney, prosecutor, judge etc they will meet the same fate as unarmed citizens, right? Its all legal right???

SECOND FEDERAL CLAIM FOR ACTION

(11) On **MARCH 7,2017**, This Pro Se Plaintiff timely filed a Federal Notice For Removal of the pending Defendant Euclid Police Department et al false State Civil/Criminal Action on case entitled CITY OF EUCLID V JOSEPH ZIEGLER, Case No: 17CRB00393 before Defendant Euclid Municipal Judge Deborah A. LeBarron, pursuant to Federal Court Rule of Civil Procedure 81 et seq; 28 U.S.C. § 1441 through 28 USC 1452 et seq; 28 USC 1331 and 1332 et seq. Because the Defendants et al systematically "denied and/or cannot enforce" clearly established Federal Law as setforth in the Notice For Removal entitled CITY OF EUCLID et al V JOSEPH ZIEGLER, Case No: 1:17-CV-465 .

(12) On **MARCH 8,2017**, Defendant Euclid Municipal Judge Deborah A. LeBarron and Defendants Euclid Police Department et al signed a Certified Mail Return Receipt Card acknowlegding that they were lawfully served with a copy of this Plaintiff timely filed a Federal Notice For Removal of pending Defendant Euclid Police Department et al False State Civil/Criminal case entitled CITY OF EUCLID V JOSEPH ZIEGLER, Case No: 17CRB00393 before Defendant Euclid Judge Deborah A. LeBarron.

(13) On **MARCH 9,2017**, This Plaintiff appeared at his Arraignment for the Defendants et al false State Civil/Criminal Action on case entitled CITY OF EUCLID V JOSEPH ZIEGLER, Case No: 17CRB00393 before Defendant Euclid Municipal Judge Deborah A. LeBarron, and was advised that Defendant Euclid Judge Deborah A. LeBarron issued a order for Defendant PATRICK GALLAGER to act Maliciously and Corruptly without Subject Matter Jurisdiction and/or with total Conflict of Interest as a Unelected Euclid Trial Court Judge for the day to arraign, fine, and sentence people in violation of Federal Law as determined by the U.S. Supreme Court.

(14) This Pro Se Plaintiff states as his claim upon which relief should be granted is based upon the fact. That this Plaintiff literally advised the Defendants et al in his timely filed Notice For Removal, and on the record at his Arraignment. That if the Defendants act Malicious and Corruptly, and without Subject Matter Jurisdiction by proceeding to conduct this Pro Se Plaintiff's Arraignment in violation of clearly established that Federal Law, that a: "State Court Shall proceed no further unless and until the case is remanded". That the Defendant Judge's atypical Judicial Immunity will be negated according to clearly established Federal Law as determined by tbe U.S. Supreme Court.

(15) This Pro Se Plaintiff states as his claim upon which relief should be granted is based upon the fact. The Defendants et al acted outside their Governmental Function, and Official Capacities. Because any/all of the Defendants et al knew or reasonably should have known that by not following their own policies/procedures, and clearly established Federal Law. That it would result in violating and/or conspiring to violate this Pro Se Plaintiff of his clearly established Federal Constitutional Rights to Life, Liberty, Jury Trial, Due Process, Freedom From Discrimination, and Freedom of Movement under Equal Protection of Law for exercising and being engaged in a Federally protected Right/Activity protected under the 1st and 14th Amendments of the United States Constitution as determined by the U.S. Supreme Court.

RIGHT TO AMEND

(16) This Plaintiff reserves the Right to Amend the herein Federal Complaint For Civil Action as may be required under FRCP, Federal Statute, and in the Interest of Justice. FRCP Rule 15. As well as introduce "Similar Acts" of recent Routine Practice of Federal Civil Rights violations committed by the Defendants et al in violation of clearly established Federal Law as determined by the U.S. Supreme Court.

WHEREFORE, This Plaintiff requests that this Honorable U.S. District Court of Northern District of Ohio honors/grants Pro Se Plaintiff's Federal Complaint For Civil Action, pursuant to 42 U.S.C. 1981, 1983, 1985, 1986 et seq, Federal Common Law, and/or any/all other applicable Federal Statutes. Since this Plaintiff has stated a claim upon which relief should/can be granted, and that there is a reasonable probability that a Jury would reasonably rule in Plaintiff's favor that the Defendants violated, and/or conspired to violate this Pro Se Plaintiff's clearly established Federal Constitutional Rights to Life, Liberty, Due Process, Freedom From Discrimination, and Freedom From Cruel and Usual Punishment, protected under Equal Protection of Law under the First, Sixth, Eighth, and Fourteenth Amendments of the U.S. Constitution and Federal Law as determined by the U.S. Supreme Court; and:

Further, This Pro Se Plaintiff's seeks/demands any/all of the following:

(A) That this Honorable US District Court issue both Declaratory and Injunctive relief to Plaintiff on any/all Claims For Action asserted by this Plaintiff against Defendants et al acting within their Official-Capacities and found to be following Federal/State Law; Policy/Procedure; and not violating this Totally Plaintiff's clearly established Federal Civil Rights, and Federal Constitutional Rights.

(B) That this Honorable US District Court issue both Declaratory and Injunctive relief to Plaintiff on any/all Claims For Action asserted by Plaintiff against Defendants et al from acting within their Official-Capacities, and Order Defendants et al from committing any further acts of Discrimination, Retaliation, Harassment, Coercion, and Intimidation of Plaintiff's, Witnesses, and Family/Friends for being engaged in exercising this Pro Se Plaintiff's clearly established Federal Civil Rights and/or Federal Constitutional Rights to Seek Redress from the Government/Courts under Due Process of Law by filing the herein meritorious Federal Civil Action Complaint;

(C) That this Honorable US District Court issue an "ORDER For Preliminary Injunctive Relief" against Defendants et al from any further imminent "retaliation, harassment, coercion, threats, and intimidation" against Plaintiff for being lawfully engaging in exercising her Federal Constitutional Right under Equal Protection of Law, and Due Process of Law Seeking Redress against/from the Government/Courts" by filing this "hybrid" Federal Complaint For Civil Action as protected under Federal Laws, and protected the 1st and 14th Amendments of the US Constitution as determined by the US Supreme Court;

(D) That this Honorable US District Court issue ORDER for Jury Trial for the herein Pro Se Plaintiff, in order, to actual, compensatory, treble, and/or punitive damages from the Defendants et al in the sum of $1,000,000(ie, One Million Dollars) on any/all Federal Claims For Action asserted by this Plaintiff against any/all Defendant(s) found to be acting OUTSIDE their Official-Capacities, and/or in their Individual-Capacities for violating clearly established Federal Laws; State Laws, Customs, Policies, Procedures, and Plaintiff's clearly established Federal Civil Rights protected under Federal Law for blatantly violating and/or conspiring to violate this Pro Se Plaintiff's clearly established Federal Laws, State Laws, Customs, Policies, protected under 42 U.S.C. 1981 et seq through 42 USC 1986 et seq; Federal Common Law, and the First and Fourteenth Amendments of the United States Constitution, as determined by the U.S Supreme Court, as all circumstances should dictate and Justice would so demand.

Date: 3/22/17

Respectfully Submitted,

PLAINTIFF IN PRO SE
JOSEPH ZIEGLER
120 COURT ST
CHARDON, OHIO 44024